SOLVAY MINERALS

TO: Distribution
FROM: Dolly A. Potter
DATE: April 9, 2003
RE: Calciner gas-to-coal air permit update

The calciner gas-to-coal air permit application was submitted to WDEQ on March 6th in Cheyenne. At that time, the application was discussed and WDEQ requested additional information. The request included actual NO_X emissions from our facility during 1986 and 1987, and a dispersion model of all existing and proposed NO_X emissions. These tasks have been completed and submitted to WDEQ. An updated CO and VOC Best Available Control Technology (BACT) analysis and the technical and economic feasibility of adding additional controls to the ESP were also requested and will be submitted by April 15th.

We received the 30-day completeness review yesterday requesting further explanation of the use of water injection for NO_X control, and the technical and economic feasibility of that and flue gas recirculation, including all cost estimates. These are the two NO_X control technologies we committed to in the application. Lastly, WDEQ requested further documentation on the availability of low NO_X burners, and stated they will continue to review current NO_X control technologies. To prepare for the possibility of WDEQ asking us to further justify not using Selective Non Catalytic Reduction (SNCR), we are continuing to research it as a NO_X control. We will meet with Fuel Tech, an SNCR vendor, on Wednesday, April 16th at 10:00.

Following submittal of these requests and the application being deemed complete, WDEQ will have a 60-day technical review to decide either to approve or disapprove the permit. This will be followed by a 30-day public comment period. If substantial comments are made, a public hearing may be requested. After comments are adequately addressed, the permit can be issued. During our March 6th meeting, WDEQ indicated the permitting process for a project of this complexity will take a total of six to nine months, and to expect "high visibility" in the news media.

Distribution: RLH, RAH, VMZ, ROH, JDP, RNS, AVn, WES, MMP, HT, DMH,
TABB, MGW, BMD, JMH, TAB, PKB